## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA **CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY

Master File No. 2:12-MD-02327 MDL 2327

LITIGATION

ETHICON WAVE 2 CASES LISTED IN EXHIBIT A TO PLAINTIFFS' NOTICE OF ADOPTION

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

## NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE OF CYNTHIA BERGMANN, M.D., FOR WAVE 2

Come now the Defendants and hereby adopt and incorporate by reference the Daubert response filed in relation to the general opinions Cynthia Bergmann, M.D. for Ethicon Wave 1 [Dkt. 2145]. Defendants respectfully request that the Court deny Plaintiffs' motion, for the reasons expressed in the Wave 1 response briefing.

Dated: August 4, 2016

Respectfully submitted,

ETHICON, INC. AND **JOHNSON & JOHNSON** 

/s/ David B. Thomas

David B. Thomas (W. Va. Bar No. 3731) Thomas Combs & Spann, PLLC 300 Summers Street, Suite 1380 P.O. Box 3824 Charleston, WV 23558-3824 (304) 414-1800

/s/ Christy D. Jones

Christy D. Jones Butler Snow LLP 1020 Highland Colony Parkway Suite 1400 (39157) P.O. Box 6010 Ridgeland, MS 39158-6010 (601) 985-4523

## **CERTIFICATE OF SERVICE**

I hereby certify that on August 4, 2016, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Christy D. Jone	es

018890\078026\32078551.v1-8/4/16